

COMMUNICATIONS ADVISORY COUNSEL LLC

2154 Wisconsin Avenue N.W.
Washington, D.C. 20007

Tel. 202-333-5273
Fax 202-333-5274

Sylvia Lesse
sylvia@Independent-Tel.com

May 1, 2008

Via electronic filing

Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

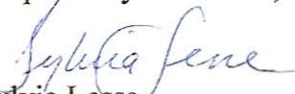
Re: South Canaan Cellular Communications Company, LP
CC Docket No. 94-102
Report Due May 1, 2008

Dear Madam Secretary:

Pursuant to the Commission's *Order*,¹ South Canaan Cellular Communications Company, LP ("South Canaan") hereby submits the attached report regarding its progress in meeting the 95% ALI-compliant handset penetration requirement.

Please contact the undersigned if you have any questions regarding this report.

Respectfully submitted,


Sylvia Lesse
Counsel for South Canaan
Cellular Communications Company, LP

cc: * Derek Poarch, Chief, Public Safety & Homeland Security Bureau, FCC
* Jeff Cohen, Public Safety & Homeland Security Bureau, FCC
Mr. Bernie Swartwood, Pike County Communications
Mr. Marty Hedgelon, Wayne County E911 Coordinator

*via electronic mail

¹ In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, DA 07-1217 (rel. Mar.9, 2007) ("Order").

**REPORT OF SOUTH CANAAN
CELLULAR COMMUNICATIONS COMPANY, L.P.**

Due May 1, 2008

Pursuant to the Commission's *Order*¹ granting South Canaan Cellular Communications Company, L.P. ("South Canaan") an extension until September 30, 2007 to achieve the goal of 95% penetration of ALI-capable handsets among its subscribers, South Canaan submits this following progress report:

(1) Number and status of Phase II requests received from PSAPs (including those the carrier may consider invalid):

South Canaan received a valid Phase II request from Pike County and provides Phase II service to this county. South Canaan initiated the provision of Phase II services to its Pike County service area on February 28, 2005. Phase I service was initiated in Wayne County on April 26, 2006 and Phase II services were initiated in Wayne County on April 18, 2008.

South Canaan received a Phase II request from the Monroe County PSAP, which, although not physically within its service territory, receives E911 information from three sites within South Canaan's service territory in Pike County. South Canaan initiated the provision of Phase II services to this PSAP on March 26, 2006.

(2) The dates on which Phase II service has been implemented or will be available to PSAPs served by its network:

South Canaan initiated the provision of Phase II services to Pike County on February 28, 2005, to Monroe County on March 26, 2006 and to Wayne County on April 18, 2008.

(3) The status of its coordination efforts with PSAPs for alternative 95% handset penetration dates

South Canaan continues to coordinate regularly with the PSAPs for both Pike and Wayne Counties. Both administrators were informed that extensions of the 95% handset penetration date were granted by the Commission. Open channels of communications exist to ensure that any new or developing concerns are addressed.

(4) Efforts to encourage customers to upgrade to location-capable handsets:

Although South Canaan has exceeded the benchmark 95% penetration rate, it continues to remind customers of the benefits associated with upgrading handsets through billing

¹ *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, DA 07-1217 (rel. Mar. 9, 2007) ("*Order*").

inserts and print advertising.

The Company also runs three significant promotions to attract new business and encourage handset upgrades. First, South Canaan has a “Test Drive” campaign which would allow analog handset users to try ALI-capable digital handsets with no phone or local wireless service cost for 30 days. At the end of the promotion period, the trial phone must be returned or the customer will incur regular cellular service expenses per the trial service application agreement. Secondly, the Company offers a prepaid promotion where a free ALI-capable handset is provided with the purchase of a \$100 value pre-paid airtime card and payment of a \$20 activation fee. Third, the Company offers a postpaid promotion where a choice of either of two free ALI-capable handsets, including one camera phone, is provided with a two-year contract including an allowance of 650 tri-state minutes for \$39.99 per month and payment of a \$20 activation fee.

In anticipation of the analog sunset this year, South Canaan has run an extensive campaign targeted to analog subscribers illustrating the superiority of the market’s digital coverage area over its analog coverage area. This new strategy has been successful in persuading additional analog subscribers to acquire digital, ALI-capable handsets.

(5) Percentage of customers with location-capable phones:

Currently, 97% of South Canaan direct customers utilize ALI-capable compliant phones.²

(6) Status in achieving compliance and whether it is on schedule to meet the revised deadline; comparison with other Tier III carrier compliance efforts

As previously reported, South Canaan achieved the benchmark 95% penetration rate on October 1, 2007.

South Canaan's efforts to achieve the 95% penetration rate compared favorably with the efforts of other Tier III carriers. For example, the out-bound call campaign of a Tier III carrier cited with approval by the Commission is similar to South Canaan's own outreach program, targeted to analog users and offering a free phone in return for a 2-year service commitment.³ Similarly, South Canaan reduced, then eliminated, the requirement for a customer to commit to a new contract term in exchange for a free compliant phone, a measure which has proven to be productive for other carriers.⁴

² Approximately 50% of the system's users are TracFone resale customers.

³ *Request for Waiver of Location-Capable Handset Penetration Deadline by Sprint Nextel Corporation*, WT Docket No. 05-286, *Order*, FCC 06-183, ¶ 32 (rel. Jan. 5, 2007) (“*Sprint Nextel Order*”). Puerto Rico Telephone Company dba Verizon Wireless offered: (1) a choice between two free GPS-compliant handsets with the renewal of the customer’s contract; (2) a one-year contract term rather than two years; and (3) 100 free minutes per month for three months. The Commission noted that other carriers have offered free upgrades without requiring an additional contract commitment. *Id.*

⁴ *Id.*

DECLARATION OF CAROLYN COPP

I, Carolyn Copp, President of SCCI, LLC, the General Partner of South Canaan Cellular Communications Company, L.P., do hereby declare under penalty of perjury that I have read the foregoing "Report of South Canaan Cellular Communications Company, L.P. Due May 1, 2008." The facts stated therein are true and correct, to the best of my knowledge, information and belief.

30 April 2008
Date

Carolyn Copp
Carolyn Copp